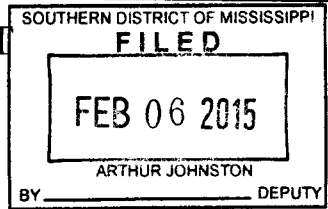


AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi



United States of America)

v.)

Frederic Amos Remy and Geovanni Corrado Davis)

Case No. 3:15mj 110-LRA)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 28, 2015 in the county of Madison in the
Southern District of Mississippi, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. Sec. 1028A	Aggravated identity theft
18 U.S.C. Sec. 1029	Fraud and related activity in connection with access devices
18 U.S.C. Sec. 371	Conspiracy to commit offense or to defraud United States

This criminal complaint is based on these facts:

See attached affidaivt, which is fully incorporated herein by reference.

☒ Continued on the attached sheet.

Ronald F. McCormick Jr.
 Complainant's signature
RONALD F. MCCORMICK JR. SPECIAL AGENT
 Printed name and title

Sworn to before me and signed in my presence.

Date: 2/6/2015

Linda R. Anderson
 Judge's signature
Linda R. Anderson, U.S. Magistrate Judge
 Printed name and title

City and state: Jackson, MS

AFFIDAVIT

I, Ronald McCormick (hereinafter referred to as Affiant), Special Agent of the United States Secret Service, being duly sworn, hereby depose and state as follows:

I am a Special Agent of the United States Secret Service (USSS) and have been so employed for over fifteen years. As part of my law enforcement duties, I am statutorily charged with investigating criminal cases involving identity theft; the possession of counterfeit access devices, and the methods and means in which people obtain or manufacture counterfeit access devices.

Based upon the information obtained as a result of this investigation, there is probable cause to believe that Frederic Amos Remy and Geovanni Corrado Davis did knowingly together commit one or more of the following offenses against the United States:

Knowingly and with intent to defraud possesses fifteen or more devices which are counterfeit or unauthorized access devices as prohibited by Section 1029 (a)(3), Title 18, United States Code.

Knowingly transfer, possess, or use, without lawful authority, a means of identification of another person as prohibited by section 1028A, Title 18 United States Code.

The two did conspire to commit an offense against the United States as prohibited by Section 371, Title 18, United States Code.

The information contained in this affidavit is based upon Affiant's knowledge of this case and the knowledge and information provided to the Affiant by other law enforcement agencies familiar with the details of this investigation.

FACTS OF THE CASE

On January 28, 2015 Paul Bunch (Madison, MS Police Department) was traveling I-55 northbound in Madison when he observed a dark colored vehicle (FL. AMK C 93) start to drift towards the mile marker 108 exit, in the City of Madison Ms. In an erratic manner and abruptly the vehicle returned to the lane of traffic and over corrected in a careless manner.

At this time upon seeing the traffic violation Bunch activated his emergency equipment to signal to the driver of the traffic stop. The vehicle went underneath the HWY 463 bridge and pulled to the far right shoulder near the mile marker 109 in the City of Madison Ms.

Bunch approached the vehicle on the passenger side and asked for the driver's license and insurance. During this time the driver Frederic Remy, was very talkative and asked

was he stopped due to his manner of driving back at the off ramp. Bunch advised that it was, and the passenger, Geovanni Davis, spoke and said that he told the driver why he was being pulled over. The driver explained he was trying to follow his GPS. The driver provided his license and his hands were visibly shaking in a very nervous manner. Officer Bunch noticed an odor of Marijuana was present. The driver was identified as Fedric Amos Remy, black male born 8/11/87. Bunch asked Remy to step out of the vehicle and began to explain the traffic stop to him. Remy was very talkative and began to explain the nature of his driving. Bunch then asked Remy of his travel itinerary and Remy began to explain in a broken voice that he was traveling back to Florida. Bunch inquired as to why they were travelling north if they were going to Florida, and Remy advised that they were going to go to Target to get some things and he had gotten lost. Bunch asked where they were staying at and Remy was having trouble remembering where they had stayed, but then gave the name of a Hotel called the Baymont located in Jackson Ms. Bunch then asked how long he and the passenger had been in Jackson and Remy advised a couple of days and that they were traveling back to Florida that day.

Bunch asked if he knew the passenger and he advised yes and his name was Geovanni. Bunch then asked Remy if he had any warrants out for his arrest and he said no. During this conversation with Remy, Bunch took notice that Remy could not stand still and was very nervous acting.

Bunch then walked to passenger, Davis, and asked for his identification. Davis advised that he didn't have them. Bunch asked if Davis had warrants and Davis said that he was on probation and proceeded to give Bunch his name and date of birth. The passenger was identified as Geovanni C. Davis, black male born 8/7/85, of Florida through NCIC. During this time Geovanni was very talkative and divulged information that was never asked by the officer. Davis explained that he knew the driver, Remy, was going to get pulled over due to his driving and that they were going to Target or WalMart to buy a Play Station 4 (PS4). Davis then proceeded to show the officer a best buy gift card located in the glove compartment. Bunch asked how long had they been in Jackson MS. and Davis stated "January a couple of days, and Fedric was seeing his people." Bunch then asked how long they were going to stay in Jackson and Davis advised for a couple of days. Davis stated that he just wanted to get a Play Station because he was bored at the hotel and he needed something to do. Bunch then returned to Remy and advised that he would run his license through NCIC and retrieve his citation book to write a citation to Remy for careless driving.

During the time of writing said citation and retrieval of license information Officer Bunch asked Remy again where he was traveling to and he advised again to Florida. Remy began to provide more information as to even say that they were looking for the Home Depot to buy some clothes and snacks for the ride back. During the retrieval of the citation book Officer Bunch contacted Sgt. Tillotson to come to his location. During this time Remy was still pacing back and forth in a nervous manner.

Sgt. Tillotson, a K9 officer, arrived and conducted a free air sniff of Remy's vehicle in which K9 TASSO alerted to the presence of a trained odor of Narcotics. Sgt. Tillotson

placed his K9 back in his vehicle and approached the passenger side and asked Davis to step out of the vehicle. Bunch then asked Remy if he was responsible for everything in the vehicle and he paused and looked at the vehicle and asked what the officer meant. Bunch repeated his question and Remy again paused and looked at the vehicle and said yes. Bunch then explained the alert that K9 TASSO gave was to the presence of a trained odor of Narcotics being present on or in his vehicle. Sgt. Tillotson asked if Remy or Davis had smoked or used narcotics in the vehicle and Remy began to stutter nervously. Bunch then asked if anyone had been in the vehicle that possibly uses narcotics and Remy advised yes. Bunch then advised Remy and Davis of the K9 alert and the odor of Marijuana inside the vehicle gave Bunch probable cause to search the vehicle.

Bunch began the search of the vehicle and observed Marijuana residue on the front floorboards and center console areas. When Bunch was searching the driver's side front seat area he recovered a wallet with credit cards and an Illinois driver's license with the name Jeffrey Lake and a picture of a black male that appeared to be the driver. Bunch showed the wallet to Remy and asked where it had come from and he explained that the wallet and license belonged to his brother and that his brother must have left it in the vehicle. Bunch secured the wallet and resumed the search. Bunch then opened the trunk and began a search of the contents that were inside. Bunch observed a bag containing a Kool-Aid container which appeared to have been unopened in which the seal did not appear to have been tampered with. When Bunch turned the container over, he noticed that the bottom of the can was loose and appeared to have a false bottom. Bunch then began to unscrew the bottom of the can and observed a tan bag containing multiple plastic cards similar in nature to credit cards. Bunch identified this type of container as consistent with the concealment methods used to hide items of a criminal nature. Bunch has seen these types of containers previously in other criminal offenses. When Bunch began to look at the cards he noticed that they had several different names on them. Bunch also found the passenger's (Davis) actual Florida License and credit cards in his name. Bunch presented the container and cards to both suspects in which the driver Remy advised that his brother must have left it in the vehicle. When Bunch showed the passenger the license and credit cards in his name Davis began to question Remy about what his brother was doing with Davis' name and denied the credit cards being his. At this time Bunch placed both suspects in custody and Sgt. Tillotson read both their Miranda Warning. Still on the shoulder of the interstate, Bunch observed a PS4 Play Station, Verizon flip phone in box, a box containing Air Jordan shoes, white shorts and blue shirt in a bag with receipt. Bunch had the vehicle transported to the Police Department for further search in a safer environment for any other narcotics or compartments that may contain narcotics or any derivatives of narcotics in which none were discovered.

Upon further inspection of the wallet that was found underneath the seat Bunch recovered the Illinois DL in the name of Jeffrey Lake depicting a photo of Remy. Another Illinois DL in the name with the same picture but with the name Andrew Fraerman. Bunch also recovered credit cards within the wallet recovered. Upon search of the credit cards located in the Kool Aid container were multiple Visa Debit cards along with credit cards with multiple names to include Davis' name and his actual Florida License along with

another Florida DL that contained the name Bob Harris. Part of the credit cards had a rubber band around them with part of a receipt that was identified as a receipt from the purchased PS4 which was recovered in the car, and was inconsistent with Geovanni's previous statement that they were on their way to purchase a PS4. Bunch enlisted the assistance of Investigator Harrison who did a check of all cards with a device to check on the magnetic stripe located on the back of the cards. Some of the cards had contained account information on the magnetic stripe, and some did not. The cards did contain the embossed and or printed account numbers located on the front of the cards. Four credit cards bearing the names Joseph Coleman, Germain Wilson and Michael Boyer were active in the since that the names on the magnetic strip matched the names on the card itself. Twenty-eight cards that were recovered did not have information on the magnetic strip but did have names and account numbers on the card itself. Three Wells Fargo Visa debit cards bearing Fedric Remy's name were located in his wallet accounts are as follows: #4426 4410 4062 3153; #4737 0290 3943 5590; and #4737 0299 5276 2939. Three credit cards that had Geovanni Davis' name that were recovered from inside the Kool-Aid container were as follows: PayPal Master Card #5581 5886 5446 6358, My Best Buy Master Card #5268 3501 1627 7158 and a Bank of America Visa #4744 7602 9915 0443. Also there were several credit cards in the names that were printed on the false driver license's bearing Remy and Davis' photos.

Bunch then escorted Remy into the interview room and read him his Miranda Warning in which he signed. Bunch read him his waiver warning and asked if he wished to answer any question Bunch may have for him in which he replied he would like an attorney.

Bunch then escorted Davis into the interview room in which his Miranda warning was read to him again. Bunch then read him the waiver warning and asked if he wished to answer questions Bunch may have for him and advised he wanted an attorney.

Through further investigation into the driver license's that appeared to be false Bunch requested that the Police Department dispatch run a check through NCIC and obtain a picture that coincides with said license's. Bunch obtained this information from the Florida DL which bore the name Bob Harris came back to a white male. Bunch then obtained the information from the two Illinois DL's in the name of Jeffrey Lake and Andrew Fraerman. Both came back to a white male. Bunch then contacted Florida DPS and was able to contact Bob Harris and verified his information. Harris advised that he did not own the credit cards in question.

Andrew Fraerman was located through Illinois DPS and contact was made with him. Andrew was out of the country at this time but did verify his information on the license and advised that he did not own the credit cards in question and that he would file a report to his local authorities upon his return.

A telephone number for Jeffrey Lake was obtained, but at this time we have not been able to make contact with him.

The following credit cards were discovered in this case:

4) Credit Cards as follows: NFL Visa Debit Name Michael Boyer #4147 0992 1217 0045, Discover Platinum Joseph S. Coleman #6011 2089 4751 7069, Mercedes Benz American Express Germain Wilson #3715 361125 72320, Capitol One Bank Joseph S. Coleman #4888 9370 9153 1618.

28) Credit Cards as follows: Bank of America Visa Andrew Fraerman #4147 4001 1898 7724, American Express Andrew Fraerman #3797252245 71005, American Express Andrew Fraerman #3732 755141 14005, Discover Business Andrew Fraerman #6011 0039 7964 0909, Discover Business Andrew Fraerman #6011 0054 0038 8388, Discover Business Andrew Fraerman #6011 0038 4562 4665, Discover Platinum Andrew Fraerman 6011 0079 6028 7505, Discover Platinum Andrew Fraerman #6011 0033 8378 8625, Discover Platinum Andrew Fraerman #6011 0031 1889 3324, Platinum MasterCard Andrew Fraerman #5466 1603 1774 8448, Platinum MasterCard Andrew Fraerman #5178 0576 1623 6837, Capitol One Bank MasterCard Andrew Fraerman #5155 6800 0022 8974, Bank of America platinum Visa Andrew Fraerman #4668 0181 8455 2310, Citi Platinum Visa Andrew Fraerman #4941 4300 0047 3150, TD Bank Visa Joseph Coleman #4266 8413 6071 5344, TD Bank Visa Bob Harris #4266 8413 6071 5344, TD Bank Visa Andrew Fraerman #4695 9630 1175 1592, BMW Premium Card American Express Andrew Fraerman #3710 721883 23000, BMW Premium Card American Express #3725 822493 31015, Mercedes Benz American Express Andrew Fraerman #3797 144452 51019, American Express Platinum Andrew Fraerman #3728 189660 12002, Mercedes Benz American Express Joseph Coleman #3772 868217 81002, American Express Joseph Coleman #3717 028945 6200, Discover Business Joseph Coleman #6011 0063 9826 4797, Discover Business Joseph Coleman #6011 0049 4350 7760, Discover Platinum Joseph Coleman #6011 0057 8038 0856, Bank of America Visa Jeffrey Lake #4941 4300 0047 3150, Citi Platinum Visa Bob Harris #4266 9020 4542 7414.

6) credit cards as follows: Bank of America Visa Geovanni Davis #4744 7602 9915 0443, My Best Buy MasterCard Geovanni C. Davis #5268 3501 1627 7158, Pay Pal MasterCard Geovanni Davis #5581 5886 5446 6358, Wells Fargo Visa debit No Name #4737 0299 5276 2939, Wells Fargo Visa Platinum Fedric A. Remy #4426 4410 4062 3153, Platinum Visa debit Fedric Amos Remy #4737 0290 3943 5590.

8) Gift cards as Follows: Vanilla Visa #4847 3589 4702 2761, Vanilla Visa #4847 3532 5748 9635, Vanilla Visa #4847 3504 3722 8008, Vanilla Visa 4847 1839 7682 5235, Vanilla Visa #4847 3589 4579 1896, Vanilla Visa #4847 3532 0761 5107, Vanilla Visa #4847 1839 7597 3176, Vanilla Visa #4847 3532 0528 7339

1) Visa gift card #4358 8062 0791 4425


1) Target Visa #4718 4980 6212 4525

- 1) Baymont Inn and Suites door key card. It should be noted that gift cards are often purchased
- 1) PS4 Play station, 1) blue shirt, 1) white shorts, 1 pair of white Air Jordan shoes with receipt, 1 Verizon flip phone
- 3) False Driver License as follows: Illinois Andrew Fraerman DL # F665-0138-2198. Illinois Jeffrey Lake DL # L200-4338-2080, Florida Bob R. Harris DL # H620-076-80-170-0.
- 2) Florida License as follows: Geovanni Corrado Davis D120-283-85-287-0 and Fedric Amos Remy R500-241-87-291-0
- 1) False bottom Kool-Aid container with plastic bag and 1 dark colored wallet, 1 dark colored ID holder
- 1 silver I-Phone 6 and 1 white I-Phone 5, with two receipts from Champs and Toys R Us.
- 1 In-Car DVD


In total the Remy and Davis possessed in excess of fifteen (15) access devices. Twenty one (21) of the access devices (credit cards) in their possession corresponded to counterfeit driver's license's also found in their possession depicting their image in place of the victim.

Two of the victims, Andrew Fraerman and Bob Harris have been contacted and confirmed their information was used without their permission.

Based on the foregoing, I respectfully submit that probable cause exists for an arrest warrant for Frederic Amos Remy and Geovanni Corrado Davis for violation of 18 USC 1029 (a)(3); 18 USC 1028A; and 18 USC 371.


Ronald McCormick
Special Agent
United States Secret Service

Sworn to and subscribed before me on the 6th day of February, 2015.


U.S. Magistrate Judge
Southern District of Mississippi